



October 31, 2005

Thomas Navin
Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Industry Guidelines for Toll Free Number Administration*
CC Docket No. 86-10

Dear Mr. Navin:

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Ordering and Billing Forum's (OBF) SMS/800 Number Administration Committee (SNAC), would like to thank the Federal Communications Commission (FCC) for its actions to date regarding ATIS OBF's recommended changes to the OBF *Industry Guidelines for Toll Free Number Administration (Guidelines)*.

This issue was brought to the FCC's attention in 2004 by ATIS on behalf of its OBF SNAC. In its October 29, 2004, letter to the Wireline Competition Bureau, ATIS recommended changes to the OBF *Industry Guidelines for Toll Free Number Administration (Guidelines)*. The goal of these recommendations was to reduce the potential for toll free service outages resulting from the unauthorized or inadvertent porting of toll free numbers. Specifically, ATIS recommended that a new code (XXX00) be adopted to allow a subscriber to request that a notification call be made to his or her Responsible Organization (Resp Org) prior to making a change to the Resp Org through the SMS 800 Help Desk.

In response to ATIS' recommendation, the FCC asked the North American Numbering Council (NANC) to review these recommendations. The NANC established the Toll Free Issues Management Group (Toll Free IMG) to work with the OBF SNAC to review the problem of inadvertent or unauthorized porting of toll free numbers and to consider the OBF SNAC recommendations to address this problem.

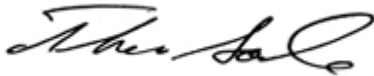
In July 2005, the NANC adopted the recommendations developed by the Toll Free IMG. These recommendations were transmitted to the FCC in the August 8, 2005, letter from Robert Atkinson, NANC Chair. According to the NANC, these recommendations "can substantially reduce inadvertent porting." In the Toll Free IMG's Final Report and Recommendation, the Toll Free IMG endorsed the OBF SNAC's recommendations and urged the FCC to direct the SMS Management Team to: (1) change the SMS/800 Tariff language to support a four (4) business

day turn-around for SMS/800 Help Desk Resp Org changes for toll free numbers that are coded as XXX00; and (2) allow changes to the SMT Tariff to clarify that XXX00 coded numbers are deemed to be consistent with the FCC's anti-marketing rules.

ATIS appreciates the work undertaken by the FCC and the NANC to assist ATIS in its efforts to minimize toll free service outages resulting from unauthorized or inadvertent porting of numbers. ATIS urges the FCC to take steps to expeditiously implement the solutions recommended by the NANC and the OBF SNAC and stands ready to assist the FCC with this matter.

Should you have any questions or if you would like additional information, please do not hesitate to contact the undersigned.

Sincerely,



Thomas Goode
Associate General Counsel

About ATIS

ATIS is a technical planning and standards development organization that is committed to rapidly developing and promoting technical and operations standards for the communications and related information technologies industry worldwide using a pragmatic, flexible and open approach. Over 1,100 participants from more than 350 communications companies are active in ATIS' industry committees, and its' Incubator Solutions Program.

ATIS OBF/SNAC

The OBF is an ATIS-sponsored open industry forum for representatives of the telecommunications industry to identify, discuss and resolve national issues which affect ordering, billing, provisioning and exchange of information about access services, other connectivity and related matters. The OBF has ten Standing Committees that address and resolve issues through the development of national industry standards and guidelines. The SMS/800 Number Administration Committee (SNAC) deals exclusively with issues related to toll-free service, including the development and maintenance of Industry Guidelines for Toll Free Number Administration (ATIS/OBF-TFG-013). These guidelines specify the responsibilities of Resp Orgs and of the SMS/800 Help Desk and describe toll-free number administration and the coordinated conversion of toll free service.

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